DOMINICK MINERVINI, ESQ.

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January 17, 2022

Re: Helen Natsis and Konstantinos Natsis v. Turner, et al., Civil Action No. 2:13-cv-7269 (JMV) (ESK)

Dear Judge Kiel:

I represent the plaintiffs in the above-entitled litigation. Paul Batista, a member of the New York Bar and also a member of the United States Court of Appeals for the Third Circuit, has on my motion been admitted on a pro hac vice basis to assist in the representation of plaintiffs.

With the consent of counsel to defendants, I am writing for the purpose of respectfully requesting that Your Honor extend, for a one-week period, from January 20, 2022 to January 27, 2022, the date for the filing of the Joint Final Pre-Trial Order.

I know that Mr. Batista and counsel to the defendants have been working together and cooperatively on the preparation of drafts of the Joint Final Pre-Trial Order. There have been exchanges of drafts, which will continue from today through January 27, 2022, in the event Your Honor grants this application. I understand that Mr. Batista, who unfortunately had to take a ten day break from work in late December and early January to recover from Covid-19, has developed a very professional rapport with counsel to defendants.

For the foregoing reasons, I respectfully request that the Court grant a one week extension, from January 20, 2022, to January 27, 2022, of the date for filing the Joint Final Pre-Trial Order.

Respectfully submitted,

s/ Dominick Minervini, esq.

Dominick Minervini, esq.

Cc: All Counsel of Record

The highlighted request is granted. The final pretrial conference scheduled for January 27, 2022 is adjourned to February 23, 2022 at 2:00 p.m. and will be conducted by Zoom conference. The Court will provide Zoom login credentials. So Ordered.

/s/ Edward S. Kiel
Edward S. Kiel, U.S.M.J.
Date: January 19, 2022